
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 14-6087
 :
 v. : Hon. Steven C. Mannion
 :
 THOMAS BACHALIS : **CRIMINAL COMPLAINT**

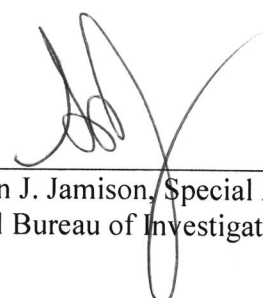
I, Stephen J. Jamison, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Stephen J. Jamison, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on December 2, 2014, at Newark, New Jersey



HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

On or about August 15, 2013, in Passaic County, in the District of New Jersey, and elsewhere, defendant

THOMAS BACHALIS

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b)(1) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Stephen J. Jamison, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about August 14, 2013 through and including August 20, 2013, a law enforcement officer working in an undercover capacity connected to a computer with an Internet Protocol ("IP") address registered to the residence of defendant THOMAS BACHALIS. The law enforcement officer downloaded thirty-two image files depicting child pornography from a shared folder of THOMAS BACHALIS' computer via a peer-to-peer network.

2. On or about August 14, 2013, the undercover law enforcement officer recorded the Global Unique Identification ("GUID") number associated with the computer sharing the files described in Paragraph 1.

3. On or about August 15, 2013, a law enforcement officer working in an undercover capacity connected to a computer with an IP address registered to the residence of defendant THOMAS BACHALIS and downloaded the following two images, among others, from a shared folder of THOMAS BACHALIS' computer via a peer-to-peer network:

IMAGE	FILENAME	DESCRIPTION
1	Other_Cleared_2yo toddler boy with cock in his ass r.jpg	This is a color image of an infant boy from the waist down and to the knees. He has no pants on. He is lying on his back on what appears to be a white towel. His legs are spread in the air exposing his penis and anus. An adult male's penis is penetrating the infant boy's anus.
2	Other_Cleared_KovTod (68).jpg	This is a color image of an infant boy. He is naked lying on what appears to be a white towel or blanket with a white pillow. There is a white card with a black stripe on the boy's chest. The boy's legs are in the air and spread apart exposing his penis. An adult male penis is in the right side of the image being held with what appears to be the adult male's right hand. A white liquid substance is seen on the tip of the adult male's penis. The adult male appears to be holding the boy's right ankle with his left hand.

4. On or about September 20, 2013, law enforcement officers executed a search warrant at the residence of THOMAS BACHALIS in Newfoundland, New Jersey (the "Residence").

5. During the search of the Residence, law enforcement conducted a forensic preview of THOMAS BACHALIS' ACER Aspire 5517 laptop (the "laptop"). The GUID number that was recorded by the undercover law enforcement officer on August 14, 2013 matched the GUID number located on the laptop. The forensic preview conducted at the Residence revealed several image files depicting child pornography on the laptop.

6. Upon questioning, THOMAS BACHALIS stated to law enforcement that he was the only person in his Residence who had access to and used his laptop. THOMAS BACHALIS also admitted to using a file-sharing, peer-to-peer program to download child pornography.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge and belief, the images described in paragraphs 1 and 3, above, traveled in interstate commerce and were produced and distributed using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.